

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

v.

No. 24-cv-10049 (LJL) (lead case)

WAYFARER STUDIOS LLC, et al.,

Defendants.

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

No. 25-cv-449 (LJL) (member case)

BLAKE LIVELY, et al.,

Defendants.

**DECLARATION OF MICHAEL J. GOTTLIEB IN SUPPORT OF RYAN REYNOLDS'S  
MOTION FOR RULE 11 SANCTIONS AGAINST PLAINTIFFS STEVE SAROWITZ,  
JAMEY HEATH, MELISSA NATHAN, JENNIFER ABEL, IT ENDS WITH US MOVIE  
LLC, AND THEIR COUNSEL**

I, Michael J. Gottlieb, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Willkie Farr & Gallagher LLP, 1875 K Street NW, Washington, DC 20006, and counsel of record for Defendant Ryan Reynolds in the above-captioned action.

2. I respectfully submit this declaration in support of Mr. Reynolds's Motion for Rule 11 Sanctions Against Plaintiffs Steve Sarowitz, Jamey Heath, Melissa Nathan, Jennifer Abel, It Ends With Us Movie LLC, and Their Counsel. I also submit the declaration to place before the Court true and correct copies of the following documents.

3. Attached as Exhibit A is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Steve Sarowitz, dated April 22, 2025.

4. Attached as Exhibit B is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Jamey Heath, dated April 22, 2025.

5. Attached as Exhibit C is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Melissa Nathan, dated April 22, 2025.

6. Attached as Exhibit D is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by Jennifer Abel, dated April 22, 2025.

7. Attached as Exhibit E is a true and correct copy of the Safe Harbor Letter and motion that I served to Mr. Freedman, Mr. Schuster, and their respective law firms, regarding claims brought by It Ends With Us Movie LLC, dated April 22, 2025.

8. Attached as Exhibit F is a true and correct copy of the Letter Response that Esra Hudson and I received from Ellyn S. Garofalo, dated May 13, 2025.

Dated: May 20, 2025

/s/ Michael J. Gottlieb

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